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November 10, 2005
(Via certified or express mail)

Mr. Kevin Turner-Environmental Scientist, OSC
U. S. Environmental Protection Agency
c/o Crab Orchard National Wildlife Refuge
8588 Rt. 148
Marion, IL 62959

Mr. Thomas Martin, Esq.
Associate Regional Counsel
77 West Jackson Boulevard (C-14J)
Chicago, IL 60604-3590

Re: Sauget Sites Area I - May 31, 2000 Unilateral Administrative Order (UAO)
Sediment / Soils Removal Action
Monthly Report; October 1 – October 31, 2005 Reporting Period

Dear Mr. Turner and Mr. Martin,

Enclosed is the Monthly Report for the Sauget Sites Area I May 31, 2000 Unilateral Administrative Order ("UAO") Sediment Removal Action. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section V, and paragraph 3.4. Reporting and covers the period from October 1 to October 31, 2005.

Sincerely,

Steven D. Smith
Project Coordinator

cc: Nabil Fayoumi – USEPA Region 5
Sandra Bron - IEPA
Mike Coffey - USFW
Richard Williams - Solutia
Cathleen Bumb - Solutia
Mayor Frank Bergman - Cahokia
Village of Sauget – c/o P. H. Weis & Associates (Attn: Brian Nelson)
Mayor R. Sauget - Sauget, IL
L. Glen Kurowski- Monsanto
Linda Tape - Husch & Eppenberger

Sauget Sites Area I - Sauget, Illinois

May 31, 2000 UAO – Dead Creek Sediment Removal Action

Status Report

Date of Report: November 10, 2005
Period Covered: October 1, 2005 – October 31, 2005

Work Performed During the Reporting Period

Groundwater Monitoring

- *Revision 01 of the Draft Groundwater Monitoring Plan - submitted to the Agencies on August 3, 2001. Although it has not received Agency approval, it has been implemented.*

TSCA Containment Cell

- *The Operations and Maintenance Report - submitted for the Agencies' review and approval on August 28, 2001- remain under review. Portions of the Plan applicable to the placement of sediments have already been approved.*
- Performed inspections of the site.
- Inspected and maintained the 6oz. geotextile/6 mil scrim reinforced poly cover over the containment cell.
- Maintained stormwater and leachate collection controls around the containment cell.
- Replaced GAC columns and rehabilitated the ons site treatment system.
- Monitored support area facilities.
- Third quarter 2005 samples from the groundwater monitoring wells around the cell being analyzed during the reporting period..

Dead Creek

At a meeting held on April 20, 2004, the U.S. EPA requested a conceptual plan for completion of the removal of the bottom soils in Dead Creek. That plan was to be based on soil removal in Creek Sectors F and D and, if sufficient room existed in the containment cell, excavation of portions of Creek Sector B. The plan was submitted to the Agencies on May 17, 2004 and included a plan for sampling the creek bottom soils to define the limits of excavation. Conditional approval for removal of additional soils from

Creek Sectors F, D, and B and for construction of the final cover on the sediment containment cell was received in a letter dated September 14, 2004. The letter also approved the installation of a liner in Creek Sector B, provided the U.S. EPA separately approves the design of the liner system. A schedule for implementation of the work was submitted to the EPA on September 30, 2004 and was approved by the Agency on October 11, 2004.

A contract was awarded to Philip Services Corporation (PSC) of Columbia, Illinois to perform the creek dewatering work. PSC completed mobilization by the end of October and started pumping water from Creek Sectors B and F in November. PSC were also awarded a separate contract for the excavation of the creek bottom soils in Creek Sectors B, D, and F.

Creek bottom soil sampling was completed in Creek Sector D by the end of October and the results of analyses of the samples were received on December 8th. Those results demonstrated that the PCB concentrations in all of the samples were below the level of concern of 0.58 ppm, with the highest concentration being 0.16 ppm in the same sample that screened higher than 0.5 ppm.

Creek Sector F was pumped down by the last week of November and sampling in the bottom of the creek began on November 29th and was completed on December 3rd. The analytical results were received in January and indicated that soils containing zinc at concentrations in excess of the risk-based concentration (RBC) were present in the near-surface soils in three areas in the creek bottom.

A technical memorandum summarizing the results of the sampling and analyses in both Creek Sectors D and F was submitted to the Agencies on January 21, 2005. Since the sample results in these two sectors of the creek indicated that only about 700 cu. yd. of soils contained constituents at concentrations above the RBC, the memorandum also presented two options for excavation of creek bottom soils in Creek Sector B. In an e-mail message dated January 28th, the Agency determined that additional sampling was required in Creek Sector B in order to define the locations and volumes of soil containing constituents with concentrations in excess of the RBC. EPA requested that a sampling plan be prepared for Agency review and approval. That plan was submitted on February 11th. The Agency requested some clarifications to the sampling plan and additional information about excavated soil volumes in various sectors of the creek during a telephone call on February 15, 2005 and those clarifications were incorporated in a revised draft plan that was submitted on February 21st 2005.

Comments on the revised sampling plan were received from the U.S. EPA on March 25, 2005. Responses to those comments were submitted on April 8th and are being reviewed by the Agency. A revised sampling plan for CS-B was also submitted to the Agency on April 8th and that plan was verbally approved on April 19th. The verbal approval was confirmed by e-mail on April 22nd.

Pumps were replaced in CS-B on April 25th and pumping of stormwater from CS-B into CS-C began that day. Sampling in CS-B commenced on May 10th and was completed on May 19th. All of the samples were shipped to an analytical laboratory and the results of the analyses were received in July. The unvalidated results were submitted to the Agency on July 13th.

Based on the results of samples taken from CS-B, CS-D, and CS-F, an excavation plan was developed to remove all of the creek bottom soils that contained constituents in excess of the risk based concentrations. This Excavation Plan was submitted to the Agencies on July 28th for review. Comments on the plan were received from the Agency on August 23, 2005. Responses to those comments were prepared and submitted on September 5, 2005. Additional comments were received from the Agency on October 12, 2005 and responses to those comments were provided at a meeting on October 20th. At that meeting, the Agency requested that a final version of the excavation plan be prepared to incorporate all of the revisions identified in the responses to comments. The requested final plan was submitted on October 28th.

Data Submittal

No data are submitted with this report.

Work Scheduled for Next Reporting Period

- Conduct routine inspection of the containment cell.
- Continue operation of the stormwater treatment system.
- Perform necessary operation and maintenance activities on the containment cell and temporary treatment system.
- Complete analyses of third quarter 2005 samples from the monitoring wells around the containment cell.
- Continue to fund the City of Cahokia's operation of the creek dewatering system.

PROJECT COMPLETION

Mobilization	100 %
Berm Construction	100 %
Liner Installation	100 %
Sediment Removal Preparation	100 %
Sediment Excavation (Site M)	100 %
Sediment Excavation (Original Scope of Work)	100 %
Sediment Excavation (Sector F)	100 %
Temporary Cover installation	100 %
Demobilization - Phase I	100 %
Final Cover Installation	0 %
Demobilization - Phase II	0 %
Final Report Preparation	0 %